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October 31, 2011

Brian Jones  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: C00295527  
Reply to your September 27, 2011 correspondence concerning CU-PVF's  
Amended Monthly Report covering February 1, 2011 – February 28, 2011

Dear Mr. Jones:

I write in reply to your letter dated September 27, 2011, to Kevin Allen, Treasurer of Citizens United Political Victory Fund ("CU-PVF"), requesting additional information regarding CU-PVF's Amended March 2011 Monthly Report, which covers the period February 1, 2011 through February 28, 2011. More specifically, you state that the report is missing occupation and/or employer information for several of the contributions disclosed in Schedule A. You request that CU-PVF either (a) file an amended report providing the missing information or (b) provide a detailed description of CU-PVF's procedures for complying with the Commission's "best efforts" requirements for obtaining the contributor identifier information required to be disclosed. (You note that CU-PVF established a "best efforts" practice for the 2010 election cycle, but state that the practice must be reconfirmed for each election cycle.)

As was the case for the 2010 election cycle, CU-PVF's treasurer believes that the procedures CU-PVF has established for obtaining and disclosing the identity of its contributors fully complies with the Commission's "best efforts" requirements. Those procedures are as follows:

First, a request for accurate and complete identification is made at the time of the initial solicitation to a prospective contributor. For written solicitations (e.g. direct mail) a response form is included listing the contributor's name and address as it appears in Citizens United's membership records. The form includes a request that the contributor correct any inaccurate or missing information. The form also asks that the contributor provide his or her occupation and employer. For oral solicitations (e.g. telemarketing), the request is made orally as part of the solicitation script. In either case, the request includes a statement that Federal law requires CU-PVF to use its best efforts to

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